

REMARKS

This Application has been reviewed carefully in light of the Office Action mailed April 7, 2004 ("*Office Action*"). Claims 1-10 were pending in the Application and stand rejected. Applicant amends Claims 1 and 7 and adds new Claims 11-14. These amendments are fully supported by the specification as originally filed. Applicant respectfully requests reconsideration and favorable action in this case.

Antecedent Basis

The Examiner suggests that various elements of Claims 1 and 6 lack antecedent basis. Specifically, the Examiner points to "said function definitions," "said set," and "the corresponding function definition" in Claim 1. The Examiner also points to "said function portions" in Claim 6. The Examiner suggests that each of these elements lacks antecedent basis. Applicant respectfully disagrees.

For example, consider "said function definitions." Applicant respectfully submits that the following language in Claim 1 provides proper antecedent basis for this claim element: "providing a set of predetermined function definitions." Application, p. 101, ln. 4. For this reason, Applicant respectfully requests the Examiner to reconsider this claim element.

For analogous reasons, Applicant respectfully submits that each element listed by the Examiner includes proper antecedent basis. Applicant therefore respectfully requests the Examiner to reconsider each of these claim elements.

Claim Rejections – 35 U.S.C. §102

The Examiner rejects Claims 1-2, 4, 6-8, and 10 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,021,115, which issued to Simpson, et al. ("*Simpson*"). To anticipate a claim, a single prior art reference must describe, either expressly or inherently, each and every element of the claim. M.P.E.P. §2131.

Applicant's independent Claim 1, as amended, recites:

A method, comprising the steps of:
providing a set of predetermined function definitions
which are different, at least one of said predetermined function
definitions defining a function for editing image data;

storing a project definition that is operable when executed to edit said image data and which includes: a plurality of function portions which each correspond to one of said function definitions in said set, and which each define at least one input port and at least one output port that are functionally related according to the corresponding function definition; a further portion which includes a source portion identifying a data source and defining an output port through which said image data from the data source can be produced, and which includes a destination portion identifying a data destination and defining an input port through which said image data can be supplied to the data destination; and binding information which includes binding portions that each associate a respective said input port with one of said output ports;
executing said project definition; and
transmitting a communication through a communication link after editing said image data during execution of said project definition.

Applicant respectfully submits that *Simpson* fails to describe each and every element of this Claim. In general, *Simpson* relates to routing switches. More particularly, *Simpson* concerns controlling Asynchronous Transfer Mode (ATM) switches.

Among other aspects of Claim 1, *Simpson* fails to disclose “providing a set of predetermined function definitions which are different, at least one of said predetermined function definitions defining a function for editing image data.” As teaching this concept, the Examiner points to elements 30-42 of Figure 2 in *Simpson*. Figure 2 is a block diagram of a routing switch. Elements 30-42 include various components of the routing switch, such as ports, wires, a buffer pool, chip buses, circuitries, and a routing table. *Simpson*, Col. 5, lines 21-46. However, none of these components show “providing a set of predetermined function definitions which are different, at least one of said predetermined function definitions defining a function for editing image data.”

Furthermore, *Simpson* fails to disclose “storing a project definition that is operable when executed to edit said image data.” As to this concept, the Examiner cites discussion in *Simpson* regarding switching data packets using at least two routing switches. *Simpson*, Col. 1, lines 32-46. However, the switching of data packets using at least two routing switches fails to show “storing a project definition that is operable when executed to edit said image data.”

In addition, *Simpson* fails to disclose “transmitting a communication through a communication link after editing said image data during execution of said project definition.” Regarding this concept, the Examiner first references a section of *Simpson* discussing transmitting digital signal cells through interconnected routing switches. *Simpson*, Col. 2, lines 47-49. The Examiner then cites another section of *Simpson* discussing serial data paths for data and strobe signals. *Simpson*, Col. 5, lines 21-28. However, neither of these sections shows “transmitting a communication through a communication link after editing said image data during execution of said project definition.”

For at least these reasons, Applicant respectfully requests reconsideration and withdrawal of the rejection of independent Claim 1. For reasons analogous to those discussed above with regard to Claim 1, Applicant respectfully requests reconsideration and withdrawal of the rejection of independent Claim 7. Claims 2, 4, 6, 8, and 10 depend from Claims 1 and 7. Therefore, Applicant respectfully requests reconsideration and withdrawal of the rejection of Claims 1-2, 4, 6-8, and 10.

Claim Rejections – 35 U.S.C. §103

The Examiner rejects Claims 3, 5, and 9 under 35 U.S.C. §103(a) as being unpatentable over *Simpson* in view of U.S. Patent No. 6,230,186, which issued to Sato et al. (“*Sato*”). These Claims depend from Claims 1 and 7, which are shown above to be patentable over *Simpson*. The introduction of *Sato* fails to provide the elements of Applicant’s Claims 1 and 7 not shown by *Simpson*. Thus, for at least these reasons, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of Claims 3, 5, and 9.

Double Patenting Rejections

The Examiner rejects Claims 1 and 7 under the judicially created doctrine of obviousness-type double patenting with respect to claim 1 of U.S. Application No. 09/658,163. The Examiner also rejects Claims 1 and 7 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claim 1 of U.S. Application No. 09/658,163 in view of “NetBuilder: an environment for integrating tools and people,” Dabke, P., et al., pages 465-472. The Examiner also rejects Claims 1 and 7 under the

judicially created doctrine of obviousness-type double patenting as being unpatentable over claim 1 of U.S. Patent No. 6,651,121 in view of U.S. Patent No. 6,370,575, which issued to Dougherty, et al. Applicant notes that each of these rejections are provisional rejections. Applicant therefore respectfully submits that, if necessary and appropriate, Applicant stands ready to file a terminal disclaimer to overcome any non-provisional double-patenting rejection.

New Claims

Applicant adds new Claims 11-14, which are fully supported by the specification as originally filed. Claims 11-14 depend from independent Claims 1 and 7, which are shown above to be allowable over the cited art. Applicant respectfully requests the Examiner to consider and allow dependent Claims 11-14.

CONCLUSION

Applicant has made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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